

HANSKI PARTNERS LLC
4 INTERNATIONAL DR, STE 110
RYE BROOK, NY 10573

July 23, 2025

The Honorable Jennifer L. Rochon
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Joint Application to Extend the Time to Submit Pretrial Filings
King Range, Jr. v. Grand Greene LLC;
Case Number 1:24-cv-02500(JLR)(SDA)

Dear Judge Rochon:

We represent Plaintiff King Range, Jr. in the above-referenced action and write jointly with counsel for Defendant Grand Greene LLC and Cross-Defendant Fjallraven USA, LLC (collectively, with Plaintiff, the “Parties”). Plaintiff and Grand Greene LLC, with the consent of Fjallraven USA, LLC, respectfully request a thirty (30) day extension of their deadline to submit a proposed Joint Pretrial Order and related pretrial filings currently due on July 28, 2025. This is the first request for an extension of this deadline.

Plaintiff and Grand Greene LLC request this extension as the Parties are engaged in discussions for a global resolution of their respective claims: Plaintiff’s claims against Grand Greene LLC and Grand Greene LLC’s claims against Fjallraven USA, LLC. The Parties believe that focusing their efforts on settlement without simultaneously expending scarce resources on pretrial filings that may not be needed will be more conducive to reaching settlement.

The following are the currently outstanding and proposed deadlines in this case:

Item	Current Deadline	Proposed Deadline
Pretrial Filings for Jury Trial (Plaintiff’s Claims against Grand Greene LLC)	July 28, 2025.	August 27, 2025
Oppositions to any motions in limine	August 11, 2025	September 10, 2025

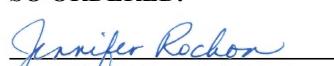
A final pretrial conference is set for November 6, 2025 with the jury trial of Plaintiff’s claims against Grand Greene LLC set to start on November 12, 2025. The Parties do not believe their request impacts these dates so have not proposed alternate dates for the pretrial conference or trial.

We thank the Court for its attention and consideration of this request.

The Court GRANTS the requested extension of deadlines to submit a proposed Joint Pretrial Order and related pretrial filings. Pretrial filings for jury trial shall be due August 27, 2025. Oppositions to any motions in limine shall be due September 10, 2025.

SO ORDERED.

Dated: July 24, 2025
New York, New York


JENNIEER L. ROCHON
United States District Judge

Respectfully,
/s Adam S. Hanski
Adam S. Hanski